

From: [Rose Kachadoorian](#)
To: [Farnsworth, George@CDPR](mailto:Farnsworth_George@CDPR)
Cc: [Reiff, Margaret@CDPR](mailto:Reiff_Margaret@CDPR); [Steve Dwinell](#); [Laws, Meredith](#)
Subject: Almonds: Pollinator label language discussion.
Date: Monday, August 05, 2013 4:44:10 PM

Thank you George.
Rose

On Aug 5, 2013, at 8:47 AM, "Farnsworth, George@CDPR"
<George.Farnsworth@cdpr.ca.gov> wrote:

FYI, I did a quick query of our d-base and found the following active products containing thiamethoxam and clothianidin.

Belay has some particularly detailed bee hazard statements.

Output Reporting

Query Parameters

Sites: ALMOND(3001)

Pesticide Type(s): INSECTICIDE

Active Chemicals *only*

Chemical Amounts:

3894 greater than .01%

or 5598 greater than .01%

or 5792 greater than .01%

3 product labels match.

Any product listed below, which includes the term "Master Label" in front of the product brand name, may not be sold or used in California.

Put a check by all the products you would like more details on.

Then select the report format you want from the list below:

Top of Form

And press the Report button:

ACTIVE (01/20/09)BELAY INSECTICIDE (59639- 150-AA)

ACTIVE (04/04/03)CENTRIC 40WG (100- 1147-AA)

ACTIVE (07/22/11)ENDIGO ZC (100- 1276-ZA)

Bottom of Form

From: Rose Kachadoorian [mailto:rkachadoorian@oda.state.or.us]
Sent: Monday, August 05, 2013 8:20 AM
To: Farnsworth, George@CDPR; Reiff, Margaret@CDPR
Subject: CA- see emails below: Pollinator lable language discussion.

Begin forwarded message:

From: "Laws, Meredith" <Laws.Meredith@epa.gov>
Subject: Re: Pollinator lable language discussion.

Date: August 2, 2013 12:41:08 PM PDT

To: "Dwinell, Steve" <Steven.Dwinell@freshfromflorida.com>, "john.peckham@state.mn.us" <john.peckham@state.mn.us>, Cary Giguere <Cary.Giguere@state.vt.us>, "jgray@nd.gov" <jgray@nd.gov>, John Scott <John.Scott@ag.state.co.us>, Bonnie Rabe <BRabe@nmda.nmsu.edu>, Brian Rowe <roweb@michigan.gov>, "Clark, Charlie" <Charlie.Clark@freshfromflorida.com>, "Helfgott, Daniel" <Helfgott.Daniel@epa.gov>, "scottde@purdue.edu" <scottde@purdue.edu>, "Stangel, David" <Stangel.David@epa.gov>, "gfarnsworth@cdpr.ca.gov" <gfarnsworth@cdpr.ca.gov>, "Green, Jamie" <Green.Jamie@epa.gov>, "Comstock, Jeff" <Jeff.Comstock@state.vt.us>, "Simpson, Julie" <Simpson.Julie@epa.gov>, "laura.quakenbush@ag.state.co.us" <laura.quakenbush@ag.state.co.us>, Richard Beard <richard.beard@usu.edu>, "Roelofs, James" <Roelofs.Jim@epa.gov>, "Kendall, Ronald" <Kendall.Ron@epa.gov>, Kachadoorian Roseann <rkachadoorian@oda.state.or.us>, Shannon Joyner <shannon.joyner@ncagr.gov>, Vicki Cassens <vcassens@purdue.edu>

Steve - - I don't think that's true, at least on paper, we still have registrations. Imidacloprid, thiamethoxam and clothianidin all have tolerances established for almonds and they are not import tolerances. We can check for labels but even if the use isn't being marketed or the growers say they aren't using them I think we have to assume they could be used.

From: Dwinell, Steve <Steven.Dwinell@freshfromflorida.com>

Sent: Friday, August 02, 2013 1:12:39 PM

To: john.peckham@state.mn.us; Giguere, Cary; jgray@nd.gov; John.Scott@ag.state.co.us; Laws, Meredith; Bonnie Rabe; Brian Rowe; Clark, Charlie; Helfgott, Daniel; scottde@purdue.edu; Stangel, David; gfarnsworth@cdpr.ca.gov; Green, Jamie; Comstock, Jeff; Simpson, Julie; laura.quakenbush@ag.state.co.us; Richard Beard; Roelofs, James; Kendall, Ronald; Rose Kachadoorian; Shannon Joyner; Vicki Cassens

Cc: Comstock, Jeff

Subject: RE: Pollinator lable language discussion.

One informational note – We have been informed that there is no neonic use on almonds, so this language is not a factor for them.

Steven E. Dwinell
Assistant Director

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From: Peckham, John (MDA) [mailto:john.peckham@state.mn.us]
Sent: Friday, August 02, 2013 12:36 PM
To: Giguere, Cary; Gray, Jim A.; Scott, John (John.Scott@ag.state.co.us); Meredith Laws (Laws.Meredith@epamail.epa.gov); Bonnie Rabe; Brian Rowe; Clark, Charlie; Daniel Helfgott; Dave Scott; David Stangel; George Farnsworth; Jamie Green; Comstock, Jeff; Julie Simpson; Laura Quakenbush; Richard Beard; roelofs.jim@epa.gov; Ron Kendall; Rose Kachadoorian; Shannon Joyner; Dwinell, Steve; Vicki Cassens
Cc: Comstock, Jeff
Subject: RE: Pollinator lable language discussion.

Sorry I'm late on this.

For applicators, simple is always better. For states, enforceability is always a challenge. Trying to meld the two is often problematic.

1.FOR CROPS UNDER CONTRACTED POLLINATION SERVICES (MANAGED BEES)

I like the section that prohibits applications while bees are foraging. Additional language would be to not make applications from X hour to X hour/temp times etc. The petal drop language is contrary to the reason why the bees are there in the first place.

The drift language is OK.

The bee movement/covering language is impractical.

2. FOR CROPS NOT UNDER CONTRACT FOR POLLINATION SERVICES (NON- MANAGED BEES)

The timing/temp language is good, but why is there a differentiation between pollination/non pollination?

The drift language is OK.

Language needs to be added for states which do not have apiary registries.

3. FOR ALL CROPS THAT ARE NOT POLLINATOR ATTRACTIVE

I like the off-site forage language

4. FOR ALL CONSUMER PRODUCTS AND ALL NON-AGRICULTURAL SITES (RESIDENTIAL/ORNAMENTAL/RECREATIONAL):

The blooming plant prohibition is problematic for many urban/landscape

applications. If adopted, it would prevent a significant number of applications from occurring at the time when applications are typically made for apple scab/apple pests or delay applications. Combo treatments are often done.

All in all, I think a more simple approach would be to have one (1) Bee Box vs. the four (4).

Bee Protection Restrictions:

1. Only apply this product between the hours of X to X unless air temperatures are below X degrees.
2. Do not apply this product from sunup to sundown, unless air temperatures are below X degrees.
3. Do not apply this product to blooming plants.
4. Do not apply this product to or allow this product to drift to non-crop areas that contain blooming plants or where bees are located.

For soybean aphid in MN these restrictions would result in applications only being made at times when bee foraging would be expected to be low.

For the apple industry, the combo products may be restricted to applications early/late in the day.

For the ornamental industry, split applications of fungicides and insecticides would have to be done.

For almonds the proposed language is going to be problematic since bees are there to pollinate.